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and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	: <b>Chapter 11 Case No.</b>
	:
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	: <b>08-13555 (SCC)</b>
	:
<b>Debtors.</b>	: <b>(Jointly Administered)</b>
-----X	

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING  
MOTION OF PLAN ADMINISTRATOR PURSUANT TO SECTIONS 8.4, 9.3,  
AND 14.1 OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11  
PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS  
TO ESTIMATE CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On February 23, 2017, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors*, filed the *Motion of Plan Administrator Pursuant to Sections 8.4, 9.3, and 14.1 of the Modified Third Amended Joint*

*Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes* [ECF No. 54904] (the “Motion”) with the Court.

2. In accordance with the Second Amended Case Management Order, the Plan Administrator established a deadline (the “Response Deadline”) for parties to object or file responses to the Motion. The Response Deadline was set for March 21, 2017 at 4:00 p.m. (Eastern Time). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadline has now passed. To the best of my knowledge, no responsive pleadings have been (a) filed with the Court on the docket of the above-referenced chapter 11 cases in accordance with the procedures set forth in the Second Amended Case Management Order or (b) served on counsel to the Plan Administrator with respect to the claims listed on the exhibit attached to the proposed order as Exhibit 1. Accordingly, the Plan Administrator respectfully requests that the proposed order granting the Motion, annexed hereto as Exhibit A, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: March 27, 2017  
New York, New York

/s/ Garrett A. Fail  
Garrett A. Fail  
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Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:
	:
<b>Debtors.</b>	:
	:
-----X	

**Chapter 11 Case No.**  
**08-13555 (SCC)**  
**(Jointly Administered)**

**ORDER PURSUANT TO SECTIONS 8.4, 9.3, AND 14.1  
OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN  
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS  
TO ESTIMATE CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

Upon the motion (the “Motion”),<sup>1</sup> dated February 23, 2017, of Lehman Brothers Holdings Inc. (“LBHI”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), for approval, pursuant to sections 8.4, 9.3, and 14.1 of the Plan and sections 105(a), 502(c), and 1142(b) of title 11 of the United States Code (the “Bankruptcy Code”), to estimate the maximum amount of the Remaining Guarantee Claims for reserve and distribution purposes, all as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

States Attorney for the Southern District of New York; (v) the parties listed on Exhibit 1 attached hereto; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted with respect to the parties listed on Exhibit 1 attached hereto; and it is further

ORDERED that the each Remaining Guarantee Claim listed on Exhibit 1 is hereby estimated in its entirety in the amount of zero dollars for purposes of establishing (i) the amount of reserves to be retained for such Remaining Guarantee Claim under the Plan and (ii) the maximum amount of Distributions (as such term is defined in the Plan) that a holder of a Remaining Guarantee Claim is entitled to receive on account of such Remaining Guarantee Claim under the Plan; and it is further

ORDERED that under no circumstances shall LBHI be required to retain any reserve on account of any Remaining Guarantee Claim listed on Exhibit 1; and it is further

ORDERED that under no circumstances shall any holder of a Remaining Guarantee Claim be entitled to a Distribution (as such term is defined in the Plan) from LBHI on account of a Remaining Guarantee Claim; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2017

\_\_\_\_\_  
Honorable Shelley C. Chapman  
United States Bankruptcy Judge

**Exhibit 1**



**MOTION TO ESTIMATE LBIE-BASED GUARANTEE CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

	NAME	CLAIM #	DEBTOR NAME	FILED DATE	TOTAL ASSERTED CLAIM AMOUNT	AMOUNT SUBJECT TO MOTION	ESTIMATED AMOUNT
1	CVF LUX MASTER S.A.R.L.	20078	Lehman Brothers Holdings Inc.	09/21/2009	\$349,463.53 *	\$349,463.53 *	\$0.00
2	CVF LUX MASTER S.A.R.L.	20092	Lehman Brothers Holdings Inc.	09/21/2009	\$143,960.93 *	\$143,960.93 *	\$0.00
3	CVI GVF LUXEMBOURG FOURTEEN S.A.R.L.	33604	Lehman Brothers Holdings Inc.	09/22/2009	\$23,155,004.94 *	\$15,000.00 *	\$0.00
4	YORK GLOBAL FINANCE BDH, LLC	21558	Lehman Brothers Holdings Inc.	09/21/2009	\$1,026,966.22	\$1,026,966.22	\$0.00
				TOTAL	\$24,675,395.62 *	\$1,535,390.68 *	